## UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

GLENN BROWN,	),
Plaintiff,	)
v.	) Case No.: 08 CV 2722
CITY OF CHICAGO, ET AL.	) ) Judge Castillo
Defendants.	) Magistrate Judge Cox
	,

## PLAINTIFF GLENN BROWN'S MOTION FOR STATUS HEARING

Plaintiff Glenn Brown, by and through his attorneys, Novack and Macey LLP, respectfully moves this Court for a status hearing. In support of his request, Brown states as follows:

- 1. On May 16, 2008, this Court dismissed Brown's complaint and appointed Monte Mann of Novack and Macey LLP as Brown's counsel. (See 5/16/08 Order, attached hereto as Ex. A.)
- 2. This Court directed Mr. Mann to "investigate this matter to determine if a proper amended complaint [could] be filed within the next ninety days." (Id.)
- 3. Counsel has investigated this matter by, among other things, discussing the case with Brown on numerous occasions, analyzing documents concerning Brown's underlying arrest, and performing legal research.
- 4. Brown requests a status conference with the Court to discuss the status of this investigation.

WHEREFORE, for the foregoing reasons, Plaintiff Glenn Brown respectfully requests that the Court:

- A. Enter an order setting this case for a status conference at the earliest possible date that is convenient for the Court; and
- B. Grant such other and further relief as the Court deems just.

Respectfully submitted,

GLENN BROWN

By: /s/ Molly S. DiRago
One of His Attorneys

Monte L. Mann Molly S. DiRago NOVACK AND MACEY LLP 100 N. Riverside Plaza Chicago, Illinois 60606 (312) 419-6900

## **CERTIFICATE OF SERVICE**

Molly S. DiRago, an attorney, hereby certifies that she served the foregoing Plaintiff Glenn Brown's Motion For Status Hearing, by causing a true and correct copy thereof to be sent by facsimile and U.S. mail to:

The City of Chicago Department of Law 30 N. LaSalle St. Suite 1400 Chicago, IL 60602 Fax: 312-744-6566

on this 28th day of July, 2008.

By: /s/ Molly S. DiRago /s/ Molly S. DiRago

# EXHIBIT A

Order Form (01/2005)

Case 1:08-cv-02722

Document 5

Filed 05/16/2008

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## United States District Court, Northern District of Illinois

Name of Assigned Judge or Magistrate Judge	Ruben Castillo	Sitting Judge if Other than Assigned Judge			
CASE NUMBER	08 C 2722	DATE	5/16/2008		
CASE TITLE	Glenn Bro	Glenn Brown vs. Chicago Police Dept., et al.			

#### DOCKET ENTRY TEXT

After careful review of this recently filed <u>pro se</u> complaint, said complaint is dismissed for failure to allege a proper cause of action against a valid defendant. Plaintiff also appears to have ongoing state criminal proceedings which may warrant a stay of this proposed civil action. Plaintiff's motion for appointment of counsel [3] is granted. Monte L. Mann, of Novack and Macey LLP, 303 W. Madison St., Suite 1500, Chicago, IL 60606, (312) 419-6900 is hereby appointed to represent plaintiff. Appointed counsel is directed to investigate this matter to determine if a proper amended complaint can be filed within the next ninety days. Appointed counsel is authorized to proceed with expedited discovery to obtain necessary police and court documents related to plaintiff's 8/19/2007 arrest.

Docketing to mail notices.

	Courtroom Deputy Initials:	RO
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